

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:
GERALD KLJAJIC

) CASE NO: 14-48020-399
Debtor) Chapter 13
) Re: Objection to Claim 3 filed by
) BANK OF NEW YORK MELLON
) TRUSTEE
) Acct: 2586
) Amount: \$83,625.21
) Response Due: January 27, 2015

TRUSTEE'S OBJECTION TO CLAIM 3

COMES NOW John V. LaBarge, Jr., Standing Chapter 13 Trustee in Bankruptcy, and for his objection to claim states as follows:

The claim of BANK OF NEW YORK MELLON TRUSTEE dated December 31, 2014, SHOULD BE DENIED AS FILED BECAUSE THE CLAIM IS AMBIGUOUS AS TO TYPE AND AMOUNT. THE CLAIM DOES NOT LIST THE PROPERTY VALUE OF THE COLLATERAL WHICH SECURES THE DEBT, SO THE TRUSTEE CANNOT DETERMINE WHETHER THE CLAIM SHOULD BE FULLY SECURED.

WHEREFORE Trustee prays the Court will enter its order sustaining this objection.

NOTICE OF FILING OF OBJECTION TO CLAIM

Please take notice that the Chapter 13 Trustee has filed an objection to your claim. Any responsive pleading in opposition to the above objection must be filed in writing with the clerk of the U.S. Bankruptcy Court, 111 S 10TH ST 4TH FL, ST LOUIS, MO 63102, and with the Chapter 13 Trustee at the address indicated below, within 21 days of the date of this notice. If no responsive pleading is filed, the objection may be sustained and the claim disallowed or modified without further notice to any party upon submission of an order from the Trustee. If a response is filed, this matter will be set for hearing upon subsequent notice.

Dated: January 06, 2015

OBJCLM-SJC

/s/ John V. LaBarge, Jr.

John V. LaBarge, Jr.

Standing Chapter 13 Trustee

P.O. Box 430908

St. Louis, MO 63143

(314) 781-8100 Fax: (314) 781-8881

trust33@ch13stl.com

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The undersigned hereby certifies that a copy of the foregoing was served upon the following either through the court's ECF system or by ordinary mail, postage pre-paid, on this day of January 06, 2015.

/s/ John V. LaBarge, Jr.

GERALD KLJAJIC
5316 BANCROFT
SAINT LOUIS, MO 63109

BANK OF NEW YORK MELLON TRUSTEE
350 HIGHLAND DR
C/O NATIONSTAR MORTGAGE LLC
LEWISVILLE, TX 75067

THE BANKRUPTCY CO
2025 S BRENTWOOD BLVD
STE 206
BRENTWOOD, MO 63144